

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

**FELIPE DE JESUS AVILA-SOTO,  
AND OTHERS SIMILARLY  
SITUATED**

**No: 6:24-cv-01392**

**JUDGE ROBERT R. SUMMERHAYS**

**V.**

**MAGISTRATE JUDGE CAROL B.  
WHITEHURST**

**SOUTH CENTRAL SUGAR CANE  
GROWERS' ASSOCIATION AND  
STERLING SUGARS, LLC**

**MOTION FOR LEAVE TO FILE REPLY MEMORANDUM  
IN SUPPORT OF MOTION TO COMPEL**

**NOW INTO COURT**, through undersigned counsel, come Defendants South Central Sugar Cane Growers' Association and Sterling Sugars, LLC, who respectfully move this Court for leave to file a reply memorandum in support of the pending Motion to Compel Deposition Testimony of Plaintiffs, Canela and Soto. In support thereof, Defendants submit as follows:

1.

Defendants filed a Motion to Compel Deposition Testimony of Plaintiffs, Canela and Soto, on January 15, 2026. R. Doc. 55.

2.

Therewith, Defendants filed a Motion to Expedite Consideration and Motion for Oral Argument, submitting that expedited consideration of the motion was necessary due to the "fast-approaching discovery deadline" of February 23, 2026. R. Doc. 56.

3.

On January 16, 2026, the Court granted the Motion to Expedite and Motion for Hearing, setting a hearing date of January 29, 2026, and an opposition deadline of January 23, 2026.

4.

Plaintiffs filed a Memorandum in Opposition on January 23, 2026, asserting arguments that necessitate a response from Defendants. These arguments announced a named plaintiff's potential withdrawal from the case, took issue with the qualifications of the Avila-Soto's deposition translator, and suggested Defendants' motion to compel is premature.

5.

Defendants respectfully submit that a concise reply brief would refute Plaintiffs' claims and would cite record evidence germane to the Court's consideration.

6.

A copy of the proposed Reply in Support is attached hereto as Exhibit A.

For the foregoing reasons, Defendants respectfully ask the court to grant them leave to file the attached Reply in Support of their Motion to Compel Deposition Testimony.

Respectfully submitted,

**PHELPS DUNBAR LLP**

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ATTORNEY FOR DEFENDANTS,  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 27<sup>th</sup> day of January, 2026, I electronically filed the foregoing Motion to the Clerk of Court for filing and uploading to the CM/ECF system which will send notification of such filing to all participating counsel of record.

/s/ Brandon Davis